

APR 10 1996

MEMORANDUM

CH2M HILL

PREPARED FOR: Sylvia Burges/EPA Region 10

DATE: April 10, 1996

COPIES TO: Edwin Liu/RP  
Paul Nemanic/RP  
Ed Petrie/RP  
Fred Ellerbusch/RP  
George Goodridge/RP  
John Abrams/RP  
Tom McLaughlin/RP  
Mike Shatynski/RP  
Betsy Carlton/RP  
Buzz Rahier/RP  
Sue Hays/Hays Consulting  
Chuck Blumenfeld/Bogle & Gates  
Doug Holsten/CH2M HILL  
Howard Steeley/Ecology  
Theresa Michelsen/Ecology  
Pam Elardo/Ecology  
Peter Wright/Monsanto  
Rene Fuentes/EPA

*Disci  
pull  
Seattle  
Rhona Paulson  
file  
RG Prepare letter  
attention*

*Judy  
didn't see document  
yesterday  
5/13  
but*

**TECHNICAL STATUS REPORT**

**CH2M HILL**

**PREPARED FOR:** Sylvia Burges/EPA Region 10  
**COPIES TO:** Byung Maeng/Ecology  
**PREPARED BY:** Liz Luecker/CH2M HILL  
**DATE:** April 10, 1996  
**SUBJECT:** Rhône-Poulenc Monthly Status Report  
**SITE NAME AND LOCATION:** Rhône-Poulenc Inc./Seattle Plant  
Tukwila, WA  
**REPORTING PERIOD:** March 1 through March 31, 1996  
**PROJECT:** 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

**Progress Made This Reporting Period**

***Task P1-Project Management***

The EPA status report was mailed to EPA on March 7.

***Task A2-Applicable Regulations and Permits***

**Leasing Arrangements.**

On March 7 and 8, trees were planted by Cerna Landscaping along the north and south boundaries of the site to comply with the City of Tukwila's requirements. RP is awaiting approval of this planting by the City.

Northwest Container removed approximately 100 cubic yards of soil southwest of the laboratory building (in Area 3) and replaced it with crushed rock. The soil removed is stockpiled directly south of the laboratory building and contains bark and topsoil. A review of the RFI data for soil samples taken near the soil removal area (samples A03-05 and A03-03), indicates that the stockpiled soil is not a dangerous waste and may be disposed of in a municipal landfill.

March 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

Northwest Container also graded and placed gravel in various areas of the site during March.

Storm Water Discharges.

No storm water from the 800,000-gallon tank was discharged during March.

***Task A3-Interim Measures***

PCB Ditch Excavation.

RP was notified by Waste Management Inc. on March 4 that the profile (BP 2464) was approved for disposal for soil from this excavation. The profile states that the soil is not RCRA or TSCA regulated and is not a Washington State Dangerous Waste. The three piles and eight drums of PCB-contaminated soil generated during excavation of the PCB ditch were loaded into trucks on March 6 by CEcon Corporation. Although the soil could be sent to a RCRA Subtitle D landfill for disposal, RP chose to be send the soil to Waste Management Inc.'s Arlington, OR, Subtitle C landfill.

Two loads were sent offsite on March 6. The first load (60,660 lbs.) contained soil plus PPE and used filters which had been stored in drums onsite. The second load (49,280 lbs.) contained the remaining bulk soil, the drummed soil from the PCB excavation, sludge from cleaning the non-PCB contaminated sewer wash water tank (see below), outfall 4 sludges (see below), well head rehabilitation sediment (which included a small amount of decontamination water [see below]), and fly ash. The manifest numbers for these two loads are 00014 and 00015.

Report.

A report documenting the compressor pad excavation, the PCB ditch excavation, sewer cleaning, and disposal of associated waste streams is currently being developed by Terra Nova Environmental Sciences and CH2M HILL.

LNAPL.

LNAPL was recovered on a regular basis from the product recovery filter during the first part of the month. RP recovered the following amounts of LNAPL in March:

March 4	350 ml
March 5	100 ml
March 8	550 ml
March 13	410 ml
March 15	30 ml

March 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

Towards the end of the month, significant quantities of LNAPL again seemed to disappear. After March 18, no LNAPL was present in H10 when the product recovery filter was checked. RP inspected the filter on March 18, 20, 25, and 31.

MW-18 was also inspected for LNAPL during March (on March 1, 4, 15, 25, and 31). Unlike last year, no measurable quantities of LNAPL were noted in MW-18 during March.

RP monitored the wells for LNAPL on March 31. The wells monitored for LNAPL were: H10, MW-12, H11, DM-7, H9, G3, B6, MW-14, MW-15, MW-17, MW-18, MW-19, and MW-20. Well B6 was not accessible at this time because a container belonging to Northwest Container was stored on top of it. No well monitored contained a measurable amount of LNAPL. Samples from wells H10, MW-12, and H11 had films. The sample from MW-19 had a sheen, while the sample from MW-15 had a slight sheen. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

### ***Task S1-Miscellaneous Field Support***

#### **Drum Disposal.**

**Rinsate from Cleaning Non-PCB-Contaminated Rain-for-Rent Tank.** Ten of the 12 drums of rinsate from cleaning non-PCB-contaminated wash water Rain-for-Rent tanks were filtered into a mobile holding tank through 5-micron filters. A sample of this filtered water was analyzed by Sound Analytical and contained 7.8 mg/l copper. This water was discharged to Metro on March 17 (500 gallons).

After the water was discharged, the remaining two drums and the four drums of decant water from some of the non-PCB-contaminated sludge drums (see below) were filtered into the mobile holding tank. A sample of this filtered water also was analyzed by Sound Analytical and contained 1.7 mg/l copper. This filtered water was discharged to Metro on March 31 (350 gallons).

**Non-PCB-Contaminated Sludge.** Fourteen drums of sludge were previously generated by cleaning the non-PCB-contaminated wash water Rain-for-Rent tank. To prepare the sludge for disposal, the water layers in the sludge drums were siphoned off into four empty drums (approximately 200 gallons of water). The sludge in nine of the drums was then solidified with fly ash by CEcon to eliminate free liquids. This stabilized sludge was added to the PCB-contaminated soils partial load (manifest 00015) and was sent offsite on March 6. The remaining five drums of sludge were retained at the site for future stabilization and landfilling, due to the high water content.

The decanted water in the four drums was filtered through 1-micron filters into the mobile holding tank, which already contained filtered water from two drums generated during an earlier rinsing of a Rain-for-Rent tank. A representative sample analyzed by Sound

March 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

Analytical contained 1.7 mg/l copper; the water was discharged to Metro on March 31 (see above).

**Sludge from Outfall 4 Cleaning and Well Rehabilitation Sediment and Water.** Two drums of sludge from cleaning outfall 4 and two drums of sediment and decontamination rinse water from well head rehabilitation were stabilized with fly ash to eliminate free liquids. These wastes were added to the partial PCB-contaminated soils load (manifest number 00015) that was taken offsite on March 6.

**PCB-Contaminated Soil.** Eight drums of PCB-contaminated soil generated during excavation of the PCB ditch were disposed of with the PCB-contaminated soil piles on March 6 under manifest 00015 (see above).

PCB-Containing Transformer.

The remaining PCB-containing transformer on the site was profiled with Rollins Environmental Services on March 11 (profile number AA158931-585). The oil contained 3 mg/l PCB; therefore, this waste was classified as non-TSCA, Washington State Dangerous Waste with a waste code of W001. The transformer was removed from the site on March 15 under manifest number 02172. The oil will be drained and incinerated at the Rollins/APTUS facility in Aragonite, UT. The transformer carcass will be disassembled and the non-metallic parts incinerated. The metal parts will be cleaned with a solvent and wipe tested for PCBs. If the metal is clean, the metallic parts will be disposed of as clean scrap metal.

PCB-Contaminated Sewer Wash Water and Sludge and API Separator Clean Out.

Rhône-Poulenc Environmental Services approved disposal of the PCB-contaminated sewer rinsate and sludge and the API Separator cleaning wastes. These wastes will be sent offsite the week of April 8 for disposal at the Rhône-Poulenc incinerator in Houston, TX.

Sewer Wash Water in Rain-for-Rent Tank.

A sample from 2.5 feet below the surface of the sewer wash water in Rain-for-Rent tank #239617 was taken on March 6 and contained 7.1 mg/l copper (unfiltered). The wash water was allowed to stand and settle some more. Samples from two, four, and six feet below the water surface were collected on March 20. An additional sample was taken from eight feet below the surface on March 27. All samples were analyzed by Sound Analytical for copper. The samples contained the following amounts of copper: two feet - 6.0 mg/l (unfiltered), four feet - 6.4 mg/l (unfiltered) and 6.2 mg/l (filtered at the site through a 1-micron filter), six feet - 6.2 mg/l (unfiltered) and 6.0 mg/l (filtered at the site), and eight feet - 6.7 mg/l (filtered at the site). The upper eight feet of sewer wash water in the tank was filtered through 1-micron filters and discharged to Metro. This

March 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

discharge occurred on March 20 (4,687 gallons), March 25 (4,689 gallons), March 26 (4,326 gallons), and March 31 (2,786 gallons).

### ***Task S3-Laboratories***

Due to problems with the existing laboratory, CH2M HILL is in the process of re-procuring analytical services. The bid package was sent to IEA, ARI, S-Cubed, Quanterra, and QAL. RP is evaluating the laboratories.

### **Deliverables Submitted**

The February Progress Report was submitted to U.S. EPA on March 7, 1996.

### **Progress Planned For Next Reporting Period**

### ***Task A2-Applicable Regulations and Permits***

#### **Leasing Arrangements.**

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete and EPA approves the Interim Measures report.

The soil and shrubbery Northwest Container Services' contractor removed in February from the north side of the Facility's North Road, near the entrance (in RFI investigation Areas BG and A3) is still being stockpiled on site. The soil was placed in two dirt piles (approximately 10 cubic yards) located at the northwest corner of the laboratory building. A review of the RFI data for soil samples taken near the soil removal area (samples A03-06, A03-07, and BG-07), indicates that the stockpiled soil is not a dangerous waste and may be disposed of in a municipal landfill.

The additional 100 cubic yards of soil generated this month by Northwest Container Services is stockpiled southwest of the laboratory (see above).

#### **Storm Water.**

Sediments in the bottom of the 800,000 gallon open-top tank will be cleaned out and managed with the non-PCB-contaminated wash water sediments. This cleaning may be held off until the rainy season is over so that solidification of the sediments before landfilling can be minimized.

March 1996 Status Report  
Rhône-Poulenc Inc  
Seattle Plant

### ***Task A3-Interim Measures***

#### **LNAPL.**

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly.

### ***Task A8-Round 3 Data Technical Memorandum***

RP is awaiting comments from EPA and Ecology on the Round 3 Tech Memo; these comments should be received during the first week of April. A meeting with EPA and Ecology regarding the Round 3 Tech Memo is expected to occur in April or May.

### ***Task S1-Miscellaneous Field Support***

#### **Drum Disposal.**

Drums remaining onsite contain sludge and rinsate from cleaning the Rain-for-Rent tanks. These wastes include: 12 drums of sludge and eight drums of rinsate from cleaning the PCB-contaminated wash water tanks, and five drums of sludge from cleaning the non-PCB-contaminated wash water tank. The PCB-contaminated sludge and rinsate are scheduled to be sent to the Rhône-Poulenc incinerator in Houston, TX during the week of April 8. The remaining drums of sludge from cleaning the non-PCB-contaminated wash water tank will be sent off site in the near future.

#### **API Separator Clean Out.**

The API Separator will be cleaned by CEcon the week of April 8, and the wastes sent off site for disposal at the Rhône-Poulenc incinerator in Houston, TX.

#### **Sewer Wash Water in Rain-for-Rent Tank.**

The Rain-for-Rent tank will be cleaned by CEcon in early April. The sludge in the bottom of the tank will be drummed and disposed of during cleaning of the 800,000-gallon tank.

#### **Outfall 4 Wash Water in Aluminum Tank.**

Approximately 1,000 gallons of outfall 4 wash water and sludge are in the aluminum tank. The water and sludge in this tank will be sampled in April and the sample sent to the Rhône-Poulenc Environmental Services Peiser Laboratory. The laboratory will analyze the sample for disposal parameters and, if the results are acceptable, this material will be included for disposal with the API Separator Sludge. The sludge and wash water would be incinerated at the Rhône-Poulenc facility in Houston, TX.

*rhône-p/MSR/03-96EPA*

[illegible]

<sup>a</sup> Solinst Model 121 oil/water interface probe. After 1/11/95, all wells were monitored using this probe when significant LNAPL is present.  
<sup>b</sup> No sheen noted when measurement device was placed in clean water, but water turned light brown after probing.  
<sup>c</sup> Orange/rust colored residue on probe.  
<sup>d</sup> Globules.  
<sup>e</sup> Dark Phase.  
<sup>f</sup> Odor of decay.  
<sup>g</sup> 1000 mL of LNAPL were bailed from H10 at 10:45 am  
<sup>h</sup> Slight sheen  
 NA = Not accessible.